

7 November 2024

Anna Collyer
Chair
Australian Energy Market Commission

Email: aemc@aemc.gov.au

Project Reference Code ERC0388

Dear Ms Collyer,

Draft rule determination - Cyber security roles and responsibilities

Energy Networks Australia (ENA) welcomes the opportunity to make this submission in response to the Commission's draft determination on the rule change on the roles and responsibilities for cyber security in the National Electricity Market (NEM).

ENA represents Australia's electricity transmission and distribution and gas distribution networks. Our members provide more than 16 million electricity and gas connections to almost every home and business across Australia.

Cyber security remains a critical priority for the energy industry now and into the future, with the risks only growing with the increasingly decentralised nature of the energy supply system. ENA welcomes increased clarity on AEMO's cyber security role and responsibilities and is generally supportive of the positions taken in the draft rule determination.

In summary:

- AEMO remains well placed to play a central role in cyber preparedness and maintaining the day-to-day cyber security of the NEM, as reflected in the draft rule.
- ENA supports the four expanded functions to be undertaken by AEMO in relation to cyber security - namely incident coordination and response planning, industry preparedness and uplift, risk assessment and advice, and information dissemination.
- The clarity provided around these functions appears sufficiently targeted to avoid potential overlap with the roles and responsibilities of other Government agencies.
- Formalising this expanded role in the rules provides certainty over funding, resourcing and liability protection for the specific cyber security functions being conferred on AEMO.
- Under these functions, participants should be supported by AEMO to improve their cyber security readiness and maturity through access to information on risks, learnings and preparedness, while not imposing any mandatory obligations or costs.

Our members look forward to working with AEMO as it takes up these expanded functions on the commencement of the final rule in December 2024.

Should you wish to discuss any aspects of this submission, please contact Dor Son Tan, Head of Distribution Networks on dstan@energynetworks.com.au.

Yours sincerely,

A handwritten signature in blue ink that reads "Dom Adams". The signature is stylized with a large 'D' and a long horizontal flourish at the end.

Dominic Adams
GM Networks